

SUPPORT A "SUSTAINABLE SCHOOLS GRANT PROGRAM" IN THE CA AIR RESOURCES BOARD'S GREENHOUSE GAS REDUCTION FUND INVESTMENT PLAN 2016-2019

AUGUST 31, 2015

Dear California Air Resources Board -

On behalf of the undersigned organizations and individuals, Green Schools Initiative is submitting comments to recommend that K-12 public schools be included as an urgent investment priority for Greenhouse Gas Reduction Fund investments in ARB's draft Three Year Investment Plan. We recommend that a new "Sustainable Schools" goal be established and supported by a new "Healthy & Sustainable Schools" grant program aligned with the California Department of Education's existing Green Ribbon Schools recognition program.

One in five Californians spends their day in a K-12 school and schools contribute roughly 5-8% of California's greenhouse gas emissions from energy and water use, transportation, waste, heat island effects, and more. We support the ARB's goals for sustainable communities and reducing greenhouse gas emissions 40% below 1990 levels by 2030. We believe that California cannot achieve its goals for sustainable communities and greenhouse gas reductions without the participation of the state's 10,300 public K-12 schools. Schools are the heart of our communities, housing more than 6 million children and thousands of teachers and staff every day. Schools are responsible for about 5% of municipal solid waste or about 763,817 tons per year, about half of which is food waste (contributing to landfill methane emissions) and about one-third is paper waste. Schools have enormous roof and asphalt-covered acreage contributing to heat island effects and polluted stormwater runoff. Dirty diesel school buses spew black carbon, increasing vulnerable children's exposures, according to ARB's own studies.

In contrast, green, sustainable schools reduce carbon footprints substantially, save scarce funds, and engage millions of students, teachers, staff, parents, and school board members in learning about and practicing environmental sustainability, and preparing students for green careers and civic responsibility. For a modest size school district with 9,600 students, the EPA WARM model predicts that switching the busfleet to biodiesel can save 582 M tons CO2, increasing the recycling rate from 30% to 35% can save 461 MT CO2, and adding 32,000 square feet of photovoltaics can save 441 MT CO2, for a total of 1,484 MT CO2 for one school district. If all 1,000 California school districts invested in integrated projects to reduce greenhouse gas emissions, they would contribute millions of tons of savings.

Schools are the perfect local venue to invest in integrated projects that produce numerous co-benefits, including: active transportation (Safe Routes to School); zero emission school buses; recycling and composting; tree planting and asphalt removal to reduce heat island effects and create green schoolyards and outdoor classrooms; cool roofs; energy and water conservation; stormwater capture and management; and other measurable greenhouse gas reduction projects. And these projects can also serve as visible, hands-on sustainability learning tools for students and the community. Several school districts and individual schools in California are leaders in sustainability. One example is the El Monte Union High School District – California's 2015 U.S. Department of Education Green Ribbon Schools District Sustainability Award winner (http://www2.ed.gov/programs/green-ribbon-schools/2015-schools/ca-district-award-el-monte-union.pdf). EMUHSD has reduced its greenhouse gas emissions by 26.7% and water use by 12.5%; has 50% of grounds in

efficient landscaping and 20% in ecologically beneficial uses that help capture stormwater runoff and support school gardens; participated in Safe Routes to School where 70% of students walk, 26% carpool, and 2% bike; has reduced waste; and engaged students in installing solar panels, composting, science projects, and more climate literacy projects. But the majority of schools – and especially those in disadvantaged communities – have outdated, inefficient, unsustainable buildings, grounds, and operations that contribute to climate change.

ARB's Draft Three Year Investment Plan does not include K-12 schools as an investment priority for greenhouse gas reductions – a big gap. The word "schools" appears only once on page 11 of the draft Plan. There is one existing program under ARB's Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP) that includes grants for rural school districts to invest in lower-emission school buses, and should be continued. Other grant programs, such as the Organics and Recycling programs managed by CalRecycle and the Urban Forestry tree planting programs managed by CalFire, do not include school districts as eligible applicants (though they could apply with non-profit or local government partners; in reality school participation has been low). Proposition 39 provides funding for energy conservation and renewables at K-12 schools, but does not cover other greenhouse gas reduction projects like transit, composting, tree planting, or asphalt removal. And the estimated funds needed to fully achieve "solar schools" and "zero emission schools" are beyond the funds available from Proposition 39.

We urge ARB to include "Sustainable Schools" as an investment element in its Three Year Investment Plan 2016-2019 and to ensure that K-12 public school districts — especially those in disadvantaged communities designated by CalEPA — are eligible to receive GGRF funds via existing or new grant programs. While we recognize that K-12 schools do not fall under the Administration's jurisdiction, sustainable, healthy schools are critical to achieving the State's greenhouse gas reduction goals. Currently, the barriers for K-12 school districts to pursue greenhouse gas reduction funds are too high, requiring separate complex applications and reporting to different agencies, and managing separate partnerships in order to be eligible.

We recommend the establishment of a "Healthy & Sustainable Schools" integrated grant program for schoolbased climate action projects that would align with and be coordinated by the California Department of Education's existing Green Ribbon Schools award and recognition program (http://www.cde.ca.gov/ls/fa/sf/greenribbonprog.asp). The Green Ribbon Schools Program administered by CDE, and participating with the U.S. Department of Education's Green Ribbon Schools award, recognizes K-12 schools and districts that are exemplary in reducing environmental and climate impact, ensuring healthy operations, and teaching environmental literacy and green career readiness. The existing Green Ribbon Schools application documents a school's or district's measurable results for reducing its carbon footprint, energy and water use, waste diversion, transit, and other sustainability efforts. A new grant program coordinated by CDE's Green Ribbon Schools program could use the existing framework and could serve as a "one stop shop" for K-12 public school districts to apply for greenhouse gas reduction funds that would achieve ARB's goals of supporting "Integrated Projects for Local Climate Action." CDE could then coordinate the review of particular school district greenhouse gas grant applications with the other relevant state agencies (ARB, CalRecycle, CalFire, etc) and administer funds to public school districts. Priority would be given to support greenhouse gas reduction projects at school districts in disadvantaged communities. This program could build on existing partnerships between CDE and ARB (like the HVIP), California Energy Commission (partnering on Prop 39), California State Water Board (Drought Response Outreach Program for Schools/DROPS), and others.

ARB can also consider other means of including K-12 schools and districts in its investment priorities, whether through strengthening existing programs, changing eligibility requirements of existing programs, and/or including schools in other programs aimed at achieving Sustainable Communities.

Green Schools Initiative is a non-profit that works to reduce the environmental footprint of K-12 schools and promote environmental literacy. The 31 organizations and individuals signing this letter support schools and

students in reducing the carbon footprint and improving the sustainability of K-12 school buildings, grounds, and operations; promoting healthy, resilient communities; and teaching environmental and outdoor education and climate literacy. We believe that sustainable schools and environmental literacy are fundamental to California's health, prosperity, and security. Thank you for your consideration of our comments to include schools as part of California's solution for mitigating climate change.

Sincerely,

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